

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

IRAN NOTICE OF
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Abad, Ascension	NY	USA	Abad, Edelmiro	Parent	N/A
2	Abad, Rebecca	NY	USA	Abad, Edelmiro	Child	N/A
3	Adams, Michael	GA	USA	Adams, Shannon	Sibling	N/A
4	Adams-Floyd, Kylie	FL	USA	Adams, Shannon	Sibling	N/A
5	Adderley, Mary	MI	USA	Adderley, Jr., Terence	Parent	N/A
6	Agnes, Carmen	NY	USA	Agnes, David	Parent	N/A
7	Ahladiotis, Miltiadis	NY	USA	Ahladiotis, Joanne	Parent	N/A
8	Ahladiotis- Salloum, Effie	NY	USA	Ahladiotis, Joanne	Sibling	N/A
9	Alger Geffen, Roxana	DC	USA	Alger, David	Child	N/A
10	Amato, Colleen	NY	USA	Ashton, Thomas	Sibling	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
11	Amigron, Nancy	NY	USA	Carroll, Michael	Sibling	N/A
12	Ammirati, Diane	NY	USA	Wall, Glen	Sibling	N/A
13	Andrucki Izzo, Laura	NY	USA	Andrucki, Jean	Sibling	N/A
14	Angelini, Annmarie	NY	USA	Angelini, Sr., Joseph	Child	N/A
15	Angelini, Mary	MD	USA	Angelini, Sr., Joseph	Child	N/A
16	Angelini, Michael	NY	USA	Angelini, Sr., Joseph	Child	N/A
17	Antonelle, Patricia	NY	USA	Ryan, Edward	Sibling	N/A
18	Antonio Garcia, Rafael	FL	USA	Espinoza, Fanny	Parent	N/A
19	Aranyos, Alexander	FL	USA	Aranyos, Patrick	Parent	N/A
20	Aranyos, Winifred	FL	USA	Aranyos, Patrick	Parent	N/A
21	Aranyos, Jr., Alexander	FL	USA	Aranyos, Patrick	Sibling	N/A
22	Arce, Margaret	NY	USA	Arce, David	Parent	N/A
23	Arestegui, Kristen	WA	USA	Arestegui, Barbara	Sibling	N/A
24	Arestegui, Nancy	CA	USA	Arestegui, Barbara	Sibling	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
25	Arestegui, Rosie	CA	USA	Arestegui, Barbara	Parent	N/A

Dated: April 19, 2021

Respectfully submitted,

KREINDLER & KREINDLER LLP

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